TRIGGERS FOCUS GROUP
RECOMMENDATION # 7
ASSESSMENT COMPLETENESS/REPRESENTATIVENESS
January 30, 2007

OBJECTIVE OF ASSESSMENT COMPLETENESS/REPRESENTATIVENESS: The objective of this requirement is to ensure sufficient monitoring to assess water quality conditions across the entire Coalition region.

PROBLEM STATEMENT: The Assessment Monitoring portion of the tentative MRP states:

"The assessment monitoring of the Long-Term Monitoring Strategy and Implementation Plan shall:·
- *Focus on a diversity of monitoring sites across the Coalition Group area (hydrology, size, and flow); -*
· *Evaluate different types of water bodies for assessment;*
· *Include a sufficient number of sampling sites to assess the entire Coalition Group area and all drainages;*
· *Propose a systematic approach, including timing, to sample initial monitoring sites and sites upstream of initial monitoring sites until the Coalition Group area is fully characterized and assessed;*
· *Include sampling sites in areas of known water quality impairments, even if they are not currently identified on the Clean Water Act (CWA) 303(d) listing;*
· *Include sampling sites that are compliance monitoring sites for TMDLs, where appropriate;*
· *Provide scientific rationale for the site selection process based on historical and/or on-going monitoring, drainage size, and land use;*
· *Discuss the criteria for the selection of each monitoring site;*
· *Conduct initial focus of the monitoring on water bodies that carry agricultural drainage or are dominated by agricultural drainage;*
· *Identify priorities with respect to work on specific watersheds, subwatersheds, and water quality parameters".*

In order to address the above considerations for the monitoring site selection process, the following criteria should be applied to a pool of monitoring sites within a Coalition that are potentially impacted by irrigated agriculture.

- Total subwatershed area (acres)
- Acres of irrigated
- Crop types (if there are multiple crop types in an area, sites should be selected to represent all crop types)
- Pesticide use in pounds applied based on recent Pesticide Use Reports (i.e., herbicides, pyrethroids, OPs)
- Periods of high use for pesticides (i.e. dormant spray, year round use)
- Mangement plan potential (could be used as a tiebreaker if two candidate sites have a similar ranking based on other criteria)
- Presence of 303 (d) listed waterbodies or other know water quality problems

- Presence of historical monitoring sites or planned monitoring sites by other organizations
- Logisitical/access issues (i.e., site access may be difficult and/or landowners may deny access to their property for sampling)
- Presence of hydrologic facilities (i.e., weirs, crossings, flow gages and other factors which may assist monitoring locations)
- Hydrologic conditions (i.e., presence or absence of flow or frequency of irrigation or storm water at a particular location; influence of urban or industrial discharge)
- Designated or actual beneficial use of the waterbody

Regional Board staff and Coalition representatives need to be assured that sampling activities adequately monitor the entire Coalition region and identify water quality problems and monitor management practice effectiveness. The tentative MRP requires that all Coalitions develop a Long-Term Monitoring Strategy. The purpose of the Long-Term Monitoring Strategy is "to form and outline a systematic on-going monitoring schedule for the Coalitions." The requirements of the Long-Term Monitoring Strategy are flexible and will allow Coalition groups to develop their own approach to monitoring. As such, the tentative MRP does not specify any conditions for completeness of the assessment although several options are available such as identifying and sampling all intermediate sized watersheds.

RECOMMENDATION:
It is recommended that no new or additional language be inserted into the tentative MRP. Coalitions need to recognize the flexibility in the tentative MRP and the need to develop a scientifically defensible approach to monitoring that assures completeness of the monitoring effort.